

## **REMARKS**

Claims 1-38 remain pending in the present application. Applicant amends Claims 1, 8, and 17-27 to clarify claimed subject matter and/or correct informalities. The original specification and drawings support these claim amendments at least at pages 8-10, 17, and at least in Figures 3, 4, and 8. Therefore, these revisions introduce no new matter.

Claims 1-38 are for consideration upon entry of the present Amendment. Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

### **Previous Claims Rejections Under 35 USC §112 and §102**

Applicant appreciates Examiner's withdrawal of the 35 U.S.C. §112 and §102 rejections in the previous Office Action.

### **Statement of Substance of Interview**

Applicant appreciates the Examiner's participation in a telephonic conference of August 9, 2007. Applicant wishes to thank the Examiner for his time and consideration.

During the interview, the claimed subject matter of the application and the Schneider and Chen references were discussed. In particular, Applicant presented arguments along the lines of those set forth below in the section entitled "Claim Rejections 35 U.S.C. §103". Specifically, Applicant presented arguments how the Schneider and Chen references do not teach or suggest features, such as expiring, trimming, and permanent flag.

In the interest of expediting prosecution of the application, and without conceding the propriety of the rejection, Applicant proposes to amend the claims to further clarify features

of Applicant's claimed subject matter. Applicant submits the amendments in writing in this Response to the Office Action and that all of the pending claims are in condition for allowance.

**Claim Rejections under 35 U.S.C. §112, 2nd para.**

**Claims 1-7** stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicant amends independent **Claim 1** to clarify the subject matter and support may be found in the original specification at least at pages 10-12, 16-18, and in the original drawings at least in Figures 4 and 7. Thus, no new matter has been introduced. Dependent Claims 2-7 depend directly or indirectly from independent Claim 1, and each are allowable as depending from an allowable base claim. Applicant respectfully submits that these claims now comply with 35 U.S.C. §112, second paragraph. Applicant respectfully requests withdrawal of the §112 rejections.

**Claim Rejections under 35 U.S.C. § 103: A, B, and C**

**A. Claims 1-15, 21, 25, 27-31, and 34-38 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Number 5,668,987 to Schneider in view of U.S. Patent Application Publication No. 2004/0001498 to Chen et al. (hereinafter "Chen").**

**B. Claim 16 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Number 5,668,987 to Schneider in view of U.S. Patent Application**

Publication No. 2004/0001498 to Chen et al. (hereinafter "Chen"), and further in view of U.S. Patent Number 4,928,239 to Baum et al. (hereinafter "Baum").

C. Claims 17-20, 22-24, 26, 32-33, and 37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Number 5,668,987 to Schneider.

Applicant respectfully traverses the rejections at least because 1) the references lack all of the recited features in the claims and 2) there is no motivation to modify and to combine the references.

Without conceding the propriety of the stated rejections, and only to advance the prosecution of this application, Applicant amends independent **Claim 1**, to clarify further features of the subject matter. Independent **Claim 1** as amended, now recites a method, comprising:

- receiving a request to add a new filter to a filter table stored in an inverse query engine cache;

- adding the new filter to the filter table, wherein the new filter comprises a condition field, a data field, an expiration time field, a filter weight field, and a permanent flag field;

- determining the filter table of a bounded size;

- maintaining the inverse query engine cache at or below a maximum cache size, wherein the size of the inverse query engine cache may be indicated by size of the filter table, estimate of size of the filter table, or by cache usage;

- wherein the inverse query engine cache comprises a control module, a cache, an add filter module, a remove filter module, a matcher, a maintainer, an expire module, a trim module, a cache weight module, a cache weight, an optimal weight, a maximum weight, a filter table, a most recently used list, and an expiration list;

- wherein the expiration list comprises a filter identifier including an expiration value in an expiration field;

- removing a filter based on an expiration time;

- trimming the filter table; and

- wherein the inverse query engine cache is used exclusively by an inverse query engine to store filters associated therewith.

Applicant respectfully submits that no such method is taught or suggested by Schneider, Chen, and Baum.

**References Fail to Teach or Suggest the inverse query engine cache comprises a control module, a cache, an add filter module, a remove filter module, a matcher, a maintainer, an expire module, a trim module, a cache weight module, a cache weight, an optimal weight, a maximum weight, a filter table, a most recently used list, and an expiration list**

First, Applicant asserts there is no *prima facie* case of obviousness established against the amended claims. All of the §103 rejection relies on Schneider. Applicant submits that Schneider does not disclose, teach or suggest the features recited in **independent Claim 1**. In particular, Schneider fails to disclose, teach or suggest “*the inverse query engine cache comprises a control module, a cache, an add filter module, a remove filter module, a matcher, a maintainer, an expire module, a trim module, a cache weight module, a cache weight, an optimal weight, a maximum weight, a filter table, a most recently used list, and an expiration list*”, as recited in Applicant’s amended Claim 1.

Second, Chen and Baum fail to compensate for the deficiencies of Schneider. Chen and Baum do not mention or discuss the amended features of Claim 1. Thus, Applicant asserts Schneider, Chen, and Baum, alone or in combination, do not teach or suggest “*the inverse query engine cache comprises a control module, a cache, an add filter module, a remove filter module, a matcher, a maintainer, an expire module, a trim module, a cache weight module, a cache weight, an optimal weight, a maximum weight, a filter table, a most recently used list, and an expiration list*”, as recited in Applicant’s amended Claim 1. Thus, Chen and Baum do not provide what is missing from Schneider to support a §103 rejection. Accordingly, Applicant submits that the evidence relied upon

by the Office does not support the rejections made under §103 against Applicant's amended Claim 1.

**There is No Suggestion or Motivation to Combine the Teachings**

Third, to establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings (MPEP §2142).

The Office stated the motivation for combining the methods of Schneider and Chen is “to incorporate the fields as filter attributes of Chen into the existing system of Schneider because Chen teaches that doing so would allow facilitating propagating filters efficiently, alleviate the burden on processing elements, and add values to the applications”. However, there is nothing in either of the references that would suggest this motivation. The asserted motivation relies on hindsight without evidence of teaching or suggestion to propose the suggested combination. Thus, this rejection is improper for this additional reason.

**Independent Claims 8, 17, and 27** are directed to a system, a computer-readable storage media, and a method, respectively, and each is allowable for reasons similar to those discussed above with respect to Claim 1.

**Dependent Claims 2-7, 9-16, and 28-31**, depend directly or indirectly from one of independent Claims 1, 8, and 27, respectively, and thus are allowable as depending from an allowable base claim. These claims are also allowable for their own recited

features that, in combination with those recited in Claims 1, 8, and 27 are not taught, or suggested by Schneider, Chen, and Baum.

**Dependent Claims 21, 25, 34-36, and 38** depend directly or indirectly from one of independent Claims 17 and 32, respectively, and are thus allowable as depending from an allowable base claim. These claims are also allowable for their own recited features that, in combination with those recited in Claims 17 and 32, are not taught, or suggested by Schneider, Chen, and Baum.

Applicant respectfully submits that the cited references do not render the claimed subject matter obvious and that the claimed subject matter, therefore, patentably distinguishes over the cited references. For all of these reasons, the §103 rejection of these claims should be withdrawn.

**Conclusion**

Claims 1-38 are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Office is requested to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

Lee & Hayes, PLLC

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By: Shirley Lee Anderson  
Shirley Lee Anderson  
Reg. No. 57,763  
509.324.9256 ext. 258